

**Before the
Federal Communications Commission
Washington DC**

In the Matter of)	
)	
Implementation of Section 224 of the Act)	WC Docket No. 07-245
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51

**COMMENTS OF EXELON ELECTRIC DISTRIBUTION
COMPANIES ON PROPOSED POLE ATTACHMENT RULES**

The Exelon Electric Distribution Companies (“Exelon EDCs”)¹ submit these comments on the Commission’s Further Notice of Proposed Rulemaking in this proceeding.² The Exelon EDCs have had direct input into the drafting of the joint comments filed today by the Edison Electric Institute (“EEI”) and the Utilities Telecom Council (“UTC”) and fully support those comments.

In addition, the Exelon EDCs would point out that none of the areas to which they provide electric service are listed as “areas unserved by broadband” in the Commission’s own Sixth Broadband Deployment Report.³ To the contrary, customers in the Exelon EDCs’ service areas, which center around two of the larger metropolitan areas in the country, Philadelphia and Chicago, already have a variety of broadband options – ILEC

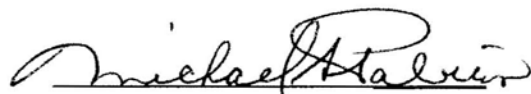
¹ The Exelon EDCs are PECO Energy Company and Commonwealth Edison Company. PECO serves 1.6 million electric and 491,000 natural gas customers in southeastern Pennsylvania. ComEd provides electric service to approximately 3.8 million customers across northern Illinois, or 70 percent of the state's population.

² *In the Matter of Implementation of Section 224 of the Act, A National Broadband Plan for Our Future*, WC Docket No. 07-245, GN Docket No. 09-51, Order and Further Notice of Proposed Rulemaking, FCC 10-84; released May 20, 2010 (“FNPRM”).

³ *In the Matter of Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act, A National Broadband Plan for Our Future*, GN Docket No. 09-137, GN Docket No. 09-51, Sixth Broadband Deployment Report; adopted July 16, 2010; released July 20, 2010.

DSL services, traditional cable television services, satellite services, and a number of wireless broadband options. The Exelon EDCs, therefore, are concerned that, for their customers, the Commission's proposed rules would only increase the pole attachment-related costs that they would have to finance through their electric rates – essentially for no purpose. The Exelon EDCs suspect that the same may also be the case for the customers of a large number of other investor-owned utilities who would be affected by the Commission's proposed rules. Because of this, the Exelon EDCs suggest that the Commission carefully consider whether application of its proposed rules to all investor-owned utilities subject to its jurisdiction is truly the best course. If the Commission truly believes that these rule changes are necessary to bring broadband services to those who currently do not have those options, then the more economic course, from a public policy perspective, would seem to be to limit the application of those rules to the areas which the Commission has already identified as unserved in that regard.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael S. Pabian", is written over a horizontal line.

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